

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

ST. CLAIR COUNTY EMPLOYEES'	)	Civil Action No. 3:18-cv-00988
RETIREMENT SYSTEM, Individually and on	)	
Behalf of All Others Similarly Situated,	)	<u>CLASS ACTION</u>
	)	
Plaintiff,	)	District Judge William L. Campbell, Jr.
	)	Magistrate Judge Alistair E. Newbern
vs.	)	
	)	DECLARATION OF CHRISTOPHER M.
ACADIA HEALTHCARE COMPANY, INC.,	)	WOOD IN SUPPORT OF LEAD
et al.,	)	PLAINTIFFS' REPLY IN FURTHER
	)	SUPPORT OF UPDATED MOTION FOR
Defendants.	)	CLASS CERTIFICATION
	)	

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I, CHRISTOPHER M. WOOD, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Tennessee, including this Court. I am a member of Robbins Geller Rudman & Dowd LLP, Lead Counsel for Lead Plaintiffs Chicago & Vicinity Laborers' District Council Pension Fund and New York Hotel Trades Council & Hotel Association of New York City, Inc. Pension Fund and the proposed Class in the above-captioned action. This declaration is made in support of Lead Plaintiffs' Reply in Further Support of Updated Motion for Class Certification. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached as Exhibits A-T are true and correct copies of the following documents:

Exhibit A: Rebuttal Report of W. Scott Dalrymple, CFA, dated April 1, 2022 **[FILED UNDER SEAL]**;

Exhibit B: Deposition Transcript of Lucy P. Allen dated March 11, 2022;

- Exhibit C: “Story Alleging Numerous Patient Issues Hits ACHC; Assessment of it Could Take Time,” *Cantor Fitzgerald*, October 11, 2018;
- Exhibit D: “Acadia Healthcare Company, Inc., Website Posting Pressures ACHC Shares,” *Credit Suisse*, October 11, 2018;
- Exhibit E: Tatiana Darie and Anders Melin, “Acadia Health Falls After Aurelius Value Reveals Short View,” *Bloomberg*, October 11, 2018;
- Exhibit F: “Acadia Healthcare slides after Aurelius publishes short re,” *TheFlyOnTheWall.com*, October 11, 2018;
- Exhibit G: John Tozzi and Anders Melin, “Acadia Healthcare Falls After Short Seller Alleges Understaffing,” *Bloomberg*, October 11, 2018;
- Exhibit H: Email from Ann Hynes to Brent Turner, re FW:ACHC [Acadia Healthcare trading lower on negative video posted by Aurelius Value], dated October 11, 2018 (ACADIA00054914);
- Exhibit I: “Reported to Be In Buy-out Talks with Private Equity Firms,” *Cantor Fitzgerald*, October 18, 2018;
- Exhibit J: Max Nisen, “Why Are Buyout Firms Ready to Risk It on Acadia?” *Bloomberg*, October 22, 2018 at <https://www.wealthmanagement.com/property-types/why-are-buyout-firms-ready-risk-it-acadia-max-nisen>;
- Exhibit K: Email from Joseph France to David Duckworth, re Cantor Quick Take/ACHC: Story Alleging Numerous Patient Issues Hits ACHC; Assessment of It Could Take Time, dated October 11, 2018 (ACADIA00073294);
- Exhibit L: “Squawk on the Street,” CNBC television broadcast, dated November 16, 2018;
- Exhibit M: Penn Little, “Purported Buyout of Acadia Healthcare by KKR: ‘Takeover Chatter’ Should be Verifiable When Lives Are On The Line,” *Seeking Alpha*, November 20, 2018;
- Exhibit N: *Motley Fool*, “Here’s Why Acadia Healthcare Company Inc. Is Plummeting,” November 16, 2018;
- Exhibit O: “ACHC Down on Report That Sale Process Has Stalled,” *Cantor Fitzgerald*, November 16, 2018;
- Exhibit P: [REDACTED] [FILED UNDER SEAL];

Exhibit Q: [REDACTED] **[FILED UNDER SEAL]**;

Exhibit R: [REDACTED] **[FILED UNDER SEAL]**;

Exhibit S: [REDACTED] **[FILED UNDER SEAL]**; and

Exhibit T: [REDACTED] **[FILED UNDER SEAL]**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 1st day of April, 2022, at Nashville, Tennessee.

s/ Christopher M. Wood  
\_\_\_\_\_  
CHRISTOPHER M. WOOD

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on April 1, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood  
CHRISTOPHER M. WOOD

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## Mailing Information for a Case 3:18-cv-00988 St. Clair County Employees' Retirement System v. Acadia Healthcare Company, Inc. et al

### Electronic Mail Notice List

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### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)